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June 20, 2014

By ECF

The Hon. John Gleeson
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

***Re: United States v. Agron Hasbajrami,
11 Cr. 623 (JG)***

***Agron Hasbajrami v. United States,
13 Cv. 6852 (JG)***

Dear Judge Gleeson:

We represent Defendant/Petitioner Agron Hasbajrami in the above-referenced matter and write to respectfully request a 3-business-day extension of time in which to file Mr. Hasbajrami's FISA-related discovery motion in the above-referenced matters.

Mr. Hasbajrami's FISA-related discovery motion is presently due this coming Wednesday, June 25, 2014, and as such the requested extension would merely extent to the following Monday, June 30, 2014. Lead counsel, Steve Zissou, is presently engaged in trial in the Southern District of New York in a case that he expects to last until the first week of July. The undersigned is similarly engaged, not in trial but in attempting to meet a July 1, 2014 filing deadline in a Second Circuit appeal. The undersigned also had a 2255 motion that needed to be filed in the District of Vermont by the end of this week (and was filed yesterday, June 19, 2014).

Accordingly, and in order to ensure that Mr. Hasbajrami's motion receives the attention it requires, we respectfully request that we be permitted to file Mr. Hasbajrami's FISA-related discovery motion on **Monday, June 30, 2014**.

We note that we have spoken to AUSA Seth DuCharme and the Government has no objection to the instant application. The Government does request, however, that the other deadlines in this case be similarly extended, and we have no objection to the Government's reciprocal request.

The Hon. John Gleeson

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Respectfully submitted,

A handwritten signature in black ink, appearing to read 'MKB', with a long horizontal flourish extending to the right.

Michael K. Bachrach

Steve Zissou

Attorneys for Defendant/Petitioner

Agron Hasbajrami

MKB/mb

cc: AUSA Seth DuCharme (by ECF)